DECLARATION

Lewis I. Cohen hereby declares under penalty of perjury that the following is true:

This is to supplement my June 26, 1991 Declaration (Attachment No. 8 of the Petition To Deny filed by Allegheny Communications Group, Inc. on June 28, 1991) concerning my research into the status of the settlement by EZ Communications, Inc. of litigation before the Allegheny County Court of Common Pleas.

I did contact the court reporter involved in that litigation. While I do not recall all the details of that discussion, I do recall that she advised me of her view that the record concerning the settlement had been sealed. I do not recalling becoming agitated during the course of that discussion.

Desiring to ascertain what (if any) documentation concerning the settlement was in fact available, I thereafter visited the office of the Prothonotary of the Court of Common Pleas. I initially requested the files concerning the case from an individual I later learned was Terry Sands. He advised me that the files were in another office. I went to that office and was given a

inquired as to my right to inspect the contents. I specifically told Mr. Sands of my prior discussion with the court reporter. As indicated in my June 26, 1991 Declaration, he opened the envelope and gave me its contents after discussing the situation with a colleague.

indicating that his advice was or might have been incorrect.

Lewis I. Cohen

Date: 19 Dec. 1991

Attachment 6

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC 91M-1683

LBC argues that Bustos cannot meet this condition because he is not a sociallly or economically disadvantaged individual. Specifically, LBC maintains that Bustos' net worth is over $1 million, that he is highly educated, that he holds significant management-level positions in broadcast stations, and that he resides in a community which is a place of above average affluence. Since Bustos cannot comply with an essential condition of the CVC letter, LBC alleges that he did not have reasonable assurance of funds availability at the time of certification.

3. In his opposition, Bustos argues that he is Hispanic, and that under Section 124.105 of the SBA's Regulations (13 CFR 124.105), Hispanic Americans are deemed to be prima facie socially and economically disadvantaged. In addition, in a declaration appended to his opposition, Bustos states that he discussed his eligibility with CVC president Joerg Klebe, and that Klebe indicated that Bustos was, in fact, an eligible recipient of loan funding by CVC.

4. In its reply, LBC argues that the standards it used in its motion are the standards used by the SBA to determine whether an individual is socially and economically disadvantaged; that the fact Bustos is Hispanic does not automatically make him socially and economically disadvantaged; that the applicable standards are contained in "SBA Policy and Procedural Release #2017" (Revised May 1, 1980), and not in the regulations Bustos cites; and that using those standards, Bustos cannot be considered socially and economically disadvantaged. LBC again maintains that Bustos cannot meet an essential precondition for CVC financing and that the addition of an issue is warranted.[1]

5. The petition to enlarge will be denied; the requested issue will not be added. The proponent of a motion to enlarge issues has the burden of coming forward with a prima facie showing in support of its requested issues. Scott & Davis Enterprises, 88 FCC 2d 1090 (Rev. Bd. 1982). LBC's petition fails to meet this standard.[2] Although LBC argues that Bustos cannot meet the eligibility requirements for an SBIC loan from CVC, LBC has failed to provide the affidavit or declaration of an expert in the field indicating that the loan will not be made, or that Bustos would not be eligible for such a loan. Merely citing a 1980 SBA policy pronouncement is manifestly insufficient since broad, general policies are subject to interpretation on an individual, case-by-case basis. See, e.g., the Commission's Policy Statement on Comparative Broadcast Hearings, 1 FCC 2d 393 (1965), and the myriad of cases interpreting that

---

1 LBC also requests that footnote 2 of Bustos' opposition be stricken as it contains ad hominem attacks on LBC's counsel and an LBC principal. The request will be granted. Such personal attacks have no bearing on the questions to be resolved, and do not advance the applicant's cause. They are unprofessional, improper, and should be discontinued. See Tr. 78-79.

2 The Commission has stated that it expects ALJs and the Review Board to "strictly adhere" to the standards it has set for enlarging the issues. Proposals to Reform the Comparative Hearing Process, 6 FCC Rcd 157, 161 (1990).

ALJ. 43 RR 2d at 1011 (¶¶31-32).

7. Therefore, LBC's its motion is wrong as a matter of law, and is based purely on speculation and surmise. Motions to enlarge issues based on speculation and surmise must be rejected. West Central Ohio Broadcasters, Inc., 1 FCC 2d 1178, 6 RR 2d 486 (Rev. Bd., 1965).2/

WHEREFORE, Amador S. Bustos urges that the "Petition to Enlarge Issues" filed by Longmont Broadcasting Corporation BE DENIED.

Respectfully submitted,

AMADOR S. BUSTOS

CORDON AND KELLY
Second Floor
1920 N Street, N. W.
Washington, D. C. 20036

By _____
Dennis J. Kelly
His Attorney

April 3, 1991

2/There is a wry irony to LBC's motion. LBC has sought to assail a bona fide minority who is acting for his own interests, and is not "fronting" for anyone else. On the other hand, the authors of LBC's motion, and Delegate Richard Rynd, a key principal of LBC, have extensive experience in using minority persons to front for white investors, in order to make a sham of the Commission's minority preference policies. As to Delegate Rynd, see WWOR-TV, Inc., FCC 91D-1, 6 FCC Rcd --, at ¶¶10-30 (Sippel, ALJ, 1991), discussing Rynd's role in a sham limited partnership leading to a "mega-payoff"; and Fresno FM Limited Partnership, FCC 91R-23, 6 FCC Rcd -- (Rev. Bd., 1991), finding Delegate Rynd's limited partnership therein "to be, just as claimed, a blatant sham of the very ilk recently noted by the Supreme Court in its [Metro Broadcasting decision]." As to the authors of the pleading, compare e.g. the following: Fresno, supra; Metroplex Communications, Inc. (WHYI-FM), 4 FCC Rcd 8149, 67 RR 2d 185 (Rev. Bd., 1989).

CERTIFICATE OF SERVICE

I, Deborah J. Hawkins, do hereby certify that on the 19th day of December, 1991, a copy of the foregoing

NORTH LATITUDE: 40° 29' 49"
WEST LONGITUDE: 80° 00' 17"

E R I DA-1005-3

purpose in the form of 100' x 18' silo at the tower base, therefore, tranmsitter building construction is unnecessary.

ANSI COMPLIANCE

RF radiation from the proposed facility has been reviewed in accordance with the **"Radio Frequency Protection Guides"**, adopted by the *American National Standards Institute, (ANSI C95.1-1982).* RF radiation from the proposed facility will not have a significant environmental impact. Utilizing the equation on *Page 9 of the OST Bulletin,* the "worst case" power density at ground level has been calculated to be 0.7811 mw/cm^2, or 78.1% of the allowable *ANSI standard* of 1.0 mw/cm^2 for FM stations. Therefore, it is believed the proposed facility should be categorically excluded from environmental processing with respect to *Section 1.1307(b).*

EMERGENCY POWER

Allegheny proposes to install motor driven power generators at its studio and transmitter sites. The generating equipment will be used whenever there is a commercial power outage, so that service to the public will be essentially uninterrupted.

FCC FORM 301

Technical questions pertaining to this statement and to *FCC Form 301, Section V-B*, have been answered in detail and are attached.

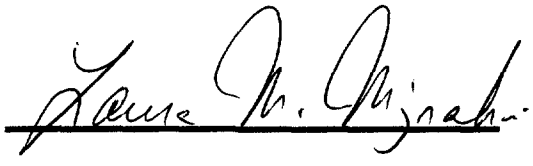
BLANKETING INTERFERENCE

Section 73.318 of the Commission's Rules and Regulations concerning FM blanketing interference has been reviewed. In the event verified complaints of **"blanketing"** are received, applicant will comply with the provisions of *Section 73.318 of the Rules* to resolve such complaints.

CONCLUSION

It is believed that the FM operation, proposed herein, conforms with the intent and requirements of the Commission's Rules and Technical Standards.

The foregoing was prepared on behalf of **Allegheny Communications Group, Inc.** by, Laura M. Mizrahi of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of her own knowledge, except such statements made on information and belief, and as to these statements she believes them to be true and correct.

By 

Laura M. Mizrahi
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me

this 24th day of July 1991

TABLE I

FM SYSTEM OPERATING SPECIFICATIONS
FOR ALLEGHENY COMMUNICATIONS GROUP, INC.
CHANNEL 229B 93.7 mHz
43.5 kW MAX.(DA) @ 157.5 METERS HAAT
PITTSBURGH, PENNSYLVANIA

JUNE, 1991

CHANNEL: 93.7 mHz

ERP: 43.5 kW MAX. (DA)

HAAT: 157.5 METERS HAAT

TRANSMITTER SITE:

NORTH LATITUDE: 40° 29' 49"
WEST LONGITUDE: 80° 00' 17"

ELEVATION: 400.8 METERS
(Above M.S.L.)

SUPPORTING STRUCTURE:

TYPE: EXISTING STEEL TOWER

	ABOVE GRADE LEVEL	ABOVE M.S.L.
HEIGHT: (With lighting)	73.5 meters	474.3 meters
FM ANTENNA: (center of radiation)	61.0 meters	461.8 meters

TABLE I
{ 2 }

FM ANTENNA SYSTEM

ANTENNA:	E R I DA-1005-3
NUMBER OF ELEMENTS:	3
RMS POWER GAIN (H & V):	1.559
ERP (H & V):	43.5 kW MAX.(DA)
BEAM TILT:	NOT APPLICABLE
NULL FILL:	NOT APPLICABLE
TRANSMISSION LINE:	CABLEWAVE HCC312-50J
DESCRIPTION:	AIR WELLFLEX
LENGTH:	275'
dB LOSS FOR LENGTH:	.2918 dB
EFFICIENCY FOR LENGTH:	93.5%
TRANSMITTER POWER OUTPUT:	29.842 KILOWATTS
TRANSMISSION LINE LOSS:	1.939 KILOWATTS
ANTENNA INPUT POWER:	27.903 KILOWATTS

TABLE II

TABULATION OF DIRECTIONAL ANTENNA DATA
E R I DA-1005-3
HORIZONTALLY POLARIZED COMPONENT
ALLEGHENY COMMUNICATIONS GROUP, INC.
PITTSBURGH, PENNSYLVANIA

JUNE 1991

AZIMUTH DEGREES TRUE	RELATIVE FIELD	ERP kW	ERP dBk	AZIMUTH DEGREES TRUE	RELATIVE FIELD	ERP kW	ERP dBk
0	1.000	43.5	16.38	230	1.000	43.5	16.38
10	1.000	43.5	16.38	240	1.000	43.5	16.38
20	1.000	43.5	16.38	250	1.000	43.5	16.38
30	1.000	43.5	16.38	260	1.000	43.5	16.38
40	0.903	35.5	15.5	264	0.980	41.8	16.21
45	0.805	28.2	14.5	266	0.958	39.9	16.01
50	0.718	22.4	13.5	268	0.936	38.1	15.81
55	0.640	17.8	12.5	270	0.915	36.4	15.61
60	0.569	14.1	11.5	272	0.894	34.7	15.41
65	0.538	12.6	11.0	274	0.874	33.2	15.21
70	0.479	10.0	10.0	276	0.854	31.7	15.01
75	0.479	10.0	10.0	278	0.835	30.3	14.81
80	0.538	12.6	11.0	280	0.815	28.9	14.61
85	0.603	15.8	12.0	282	0.835	30.3	14.81
90	0.671	19.6	13.0	284	0.854	31.7	15.01
95	0.760	25.1	14.0	286	0.874	33.2	15.21
100	0.852	31.6	15.0	288	0.894	34.8	15.41
110	1.000	43.5	16.38	290	0.915	36.4	15.61
120	1.000	43.5	16.38	292	0.936	38.1	15.81
130	1.000	43.5	16.38	294	0.958	39.9	16.01
135	1.000	43.5	16.38	296	0.980	41.8	16.21
140	1.000	43.5	16.38	300	1.000	43.5	16.38
150	1.000	43.5	16.38	310	1.000	43.5	16.38
160	1.000	43.5	16.38	315	1.000	43.5	16.38
170	1.000	43.5	16.38	320	1.000	43.5	16.38
180	1.000	43.5	16.38	330	1.000	43.5	16.38
190	1.000	43.5	16.38	340	1.000	43.5	16.38
200	1.000	43.5	16.38	350	1.000	43.5	16.38
210	1.000	43.5	16.38				
220	1.000	43.5	16.38				
225	1.000	43.5	16.38				

TABLE III

TABULATION OF TERRAIN AND COVERAGE DATA

TABLE III

- 2 -

AZ (degs)	HAAT (m)	*ERP (kW)	CONTOUR LEVELS (dBu): 70.0	60.0	54.0
260.0	160	43.4510	32.6	52.2	64.9
264.0	168	41.7830	33.0	52.7	65.5
266.0	173	39.9025	33.2	52.9	65.6
268.0	180	38.1066	33.5	53.2	65.9
270.0	186	36.3915	33.6	53.3	66.0
272.0	193	34.7720	33.8	53.5	66.3
274.0	200	33.1894	34.1	53.7	66.5
276.0	205	31.6957	34.0	53.6	66.5
278.0	206	30.2691	33.8	53.3	66.2
280.0	206	28.9068	33.4	52.9	65.7
282.0	201	30.2691	33.4	52.9	65.7
284.0	191	31.6957	32.9	52.4	65.1
286.0	175	33.1894	31.9	51.5	64.0
288.0	160	34.7536	30.8	50.2	62.7
290.0	149	36.3915	30.1	49.3	61.9
292.0	143	38.1066	29.9	48.8	61.4
294.0	139	39.9025	29.7	48.6	61.2
296.0	136	41.7830	29.7	48.6	61.2
300.0	133	43.4510	29.8	48.5	61.2
310.0	134	43.4510	29.9	48.7	61.4
315.0	123	43.4510	28.8	47.1	59.7
320.0	118	43.4510	28.4	46.5	59.0
330.0	112	43.4510	27.7	45.5	58.0
340.0	108	43.4510	27.2	44.9	57.2
350.0	111	43.4510	27.6	45.4	57.8

60 dBu COVERAGE CONTOUR - AREA: 7,877.6 SQUARE KILOMETERS
POPULATION: 2,398,677 PERSONS

Distance to contours established by means of a computer program which utilizes the FM field strength data found in Figure 1 of FCC Section 73.333.

* ERP data from Table II.

Note: 70 dBu, 60 dBu and 54 dBu contours based on F(50:50) curves.

TABLE III

- 3 -

TABULATION OF TERRAIN AND INTERFERENCE DATA
FOR PROPOSED ALLEGHENY COMMUNICATIONS GROUP, INC. FACILITY
93.7 mHz CHANNEL 229B 43.5 kW MAX.(DA) @ 157.5 METERS HAAT
PITTSBURGH, PENNSYLVANIA

DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.7000 MHz
Coordinates: N 40 29 49 W 80 0 17
F(50,10) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	*ERP (kW)	CONTOUR LEVELS (dBu): 51.0
.0	115	43.4510	80.6
10.0	131	43.4510	83.2
20.0	135	43.4510	83.8
30.0	134	43.4510	83.6
40.0	131	35.4813	80.2
45.0	131	28.1838	76.8
50.0	146	22.3872	76.0
55.0	147	17.7828	72.9
60.0	152	14.1254	70.6
65.0	154	12.5893	69.2
70.0	163	10.0000	67.5
75.0	168	10.0000	68.3
80.0	169	12.5893	71.5
85.0	172	15.8489	75.0
90.0	178	19.9526	78.8
95.0	194	25.1189	84.0
100.0	180	31.6228	85.5
110.0	152	43.4510	86.3
120.0	165	43.4510	88.0
130.0	179	43.4510	89.9
135.0	189	43.4510	91.1
140.0	178	43.4510	89.7
150.0	173	43.4510	89.1
160.0	173	43.4510	89.1
170.0	155	43.4510	86.7
177.0	162	43.4510	87.6
180.0	159	43.4510	87.2
190.0	142	43.4510	84.8
200.0	148	43.4510	85.7
210.0	182	43.4510	90.3
220.0	187	43.4510	90.8
225.0	181	43.4510	90.1
230.0	184	43.4510	90.5

TABLE III

AZ (degs)	HAAT (m)	*ERP (kW)	CONTOUR LEVELS (dBu): 51.0
240.0	167	43.4510	88.3
250.0	159	43.4510	87.3
260.0	160	43.4510	87.4
264.0	168	41.7830	87.8
266.0	173	39.9025	87.9
268.0	180	38.1066	88.1
270.0	186	36.3915	88.2
272.0	193	34.7720	88.4
274.0	200	33.1894	88.7
276.0	205	31.6957	88.6
278.0	206	30.2691	88.2
280.0	206	28.9068	87.5
282.0	201	30.2691	87.5
284.0	191	31.6957	86.9
286.0	175	33.1894	85.5
288.0	160	34.7536	84.1
290.0	149	36.3915	83.3
292.0	143	38.1066	83.1
294.0	139	39.9025	83.1
296.0	136	41.7830	83.3
300.0	133	43.4510	83.5
310.0	134	43.4510	83.7
315.0	123	43.4510	81.9
320.0	118	43.4510	81.2
330.0	112	43.4510	80.1
340.0	108	43.4510	79.4
350.0	111	43.4510	80.0

* ERP data from Table II.

Note: 51 dBu contour based on F(50:10) curves.

TABLE IV

73.213 ALLOCATION STUDY
PROPOSED CHANNEL 229B - PITTSBURGH, PENNSYLVANIA
JUNE 1991

Search of channel 229B (93.7 MHz), at N. 40 29 49, W. 80 0 17.

CALL	CITY	ST	CHN	CL	S	DIST	REQ. SEPN	BRNG	CLEARANCE	
WVCW	Barrackville	WV	226	A	C	109.4	69.0	188.8°	40.4	
WQYX	Clearfield	PA	226	B1	A	150.8	71.0	69.4°	79.8	
ALC	Duncansville	PA	226	A	A	126.2	69.0	91.5°	57.2	
ALC	Barrackville	WV	226	A	U	111.1	69.0	187.2°	42.1	
ALC	Youngstown	OH	227	B	U	84.5	74.0	320.0°	10.5	
WBBG	Youngstown	OH	227	B	L	84.5	74.0	320.0°	10.5	
ALC	Meyersdale	PA	227	A	U	112.8	69.0	132.4°	43.8	
NEW	Meyersdale	PA	227	A	A	112.5	69.0	132.0°	43.5	
WQZS	Meyersdale	PA	227	A	C	114.7	69.0	133.7°	45.7	
WRHB	Barnesboro	PA	228	A	A	102.3	105.0	79.4°	-2.7	***
ALC	Buckhannon	WV	228	B1	V	177.8	145.0	183.7°	32.8	
ALC	Berkeley Springs	WV	228	A	U	181.1	105.0	122.6°	76.1	
WBTQ	Buckhannon	WV	228	A	L	174.2	105.0	185.2°	69.2	
WBNV	Barnesville	OH	228	A	C	122.0	105.0	237.3°	17.0	
ALC	Barnesville	OH	228	A	U	114.8	105.0	240.4°	9.8	
WQYX	Clearfield	PA	228	A	L	144.7	105.0	65.3°	39.7	
WCSTFM	Berkeley Springs	WV	228	A	L	181.1	105.0	122.6°	76.1	
WVCV	Boalsburg	PA	229	A	A	192.5	163.0	81.5°	29.5	
WRVCFM	Ashland	KY	229	C1	L	327.4	270.0	224.3°	57.4	
WBLK	Depew	NY	229	B	L	281.5	241.0	19.5°	40.5	
ALC	Ashland	KY	229	C1	U	327.4	270.0	224.3°	57.4	
ALC	Depew	NY	229	B	U	281.5	241.0	19.5°	40.5	
ALC	Mount Vernon	OH	229	B	U	206.7	241.0	267.2°	-34.3	
ALC	Pittsburgh	PA	229	B	U	6.4	241.0	195.9°	-234.6	
WQIO	Mount Vernon	OH	229	B	L	206.7	241.0	267.2°	-34.3	**
WBZZ	Pittsburgh	PA	229	B	L	6.4	241.0	195.9°	-234.6	
WAZR	Woodstock	VA	229	B1	C	221.9	211.0	146.0°	10.9	
WBLK	Depew	NY	229	B	A	281.5	241.0	19.5°	40.5	
ALC	Woodstock	VA	229	B1	U	221.9	211.0	146.0°	10.9	
ALC	Boalsburg	PA	229	A	A	189.8	163.0	80.6°	26.8	
WKBIFM	St. Marys	PA	230	B1	A	158.4	145.0	49.9°	13.4	
ALC	Clearfield	PA	230	B1	V	143.9	145.0	67.4°	-1.1	
WQYX	Clearfield	PA	230	B1	A	143.2	145.0	67.8°	-1.8	*
ALC	St. Marys	WV	230	B1	U	160.1	145.0	219.8°	15.1	
WRRRFM	St. Marys	WV	230	B1	L	160.3	145.0	219.3°	15.3	
WHBCFM	Canton	OH	231	B	L	119.6	74.0	291.9°	45.6	
WQZKFM	Keyser	WV	231	B	L	149.6	74.0	143.1°	75.6	

TABLE IV

- 2 -

ALC	Canton	OH	231	B	U	119.6	74.0	291.9°	45.6
ALC	Keyser	WV	231	B	U	149.6	74.0	143.1°	75.6
ALC	Cresson	PA	232	A	U	125.8	69.0	91.6°	56.8
ALC	Saegertown	PA	232	A	U	135.0	69.0	354.1°	66.0
WRLF	Fairmont	WV	232	A	C	114.4	69.0	185.8°	45.4
WBXQ	Cresson	PA	232	A	L	125.8	69.0	91.6°	56.8
WEOZ	Saegertown	PA	232	A	L	135.0	69.0	354.1°	66.0
ALC	Fairmont	WV	232	A	U	113.4	69.0	187.0°	44.4
WRLF	Fairmont	WV	232	A	C	115.6	69.0	188.5°	46.6
WELA	East Liverpool	OH	282	B	L	52.7	20.0	286.3°	32.7
WELA	East Liverpool	OH	282	B	A	52.7	20.0	286.3°	32.7
ALC	East Liverpool	OH	282	B	U	52.7	20.0	286.3°	32.7

* Ordered to Channel 230B1 per MM Docket 88-496. (See Engineering Statement).

** Grandfathered short spacing. (See Engineering Statement).

*** Call sign and CP cancelled as of 8/12/90. Open allocation remains on Channel 223A per discussion with allocations branch. No allocation remains on Channel 228A.

TABLE V

WBZZ CHANNEL 229B
41 kW @ 168 METERS HAAT
PITTSBURGH, PA
(contour utilized in 73.213(a) compliance showing)

DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.7000 MHz
Coordinates: N 40 26 28 E 80 1 32
F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu): 60.0
.0	148	41.0000	50.1
10.0	147	41.0000	50.0
20.0	165	41.0000	52.3
30.0	163	41.0000	52.0
40.0	193	41.0000	54.9
50.0	198	41.0000	55.4
60.0	213	41.0000	56.6
70.0	212	41.0000	56.5
80.0	177	41.0000	53.5
90.0	166	41.0000	52.3
100.0	194	41.0000	55.1
110.0	224	41.0000	57.5
120.0	194	41.0000	55.0
130.0	167	41.0000	52.5
140.0	140	41.0000	49.0
150.0	140	41.0000	49.0
160.0	149	41.0000	50.3
170.0	144	41.0000	49.6
180.0	132	41.0000	47.8
190.0	131	41.0000	47.7
200.0	142	41.0000	49.3
210.0	170	41.0000	52.8
220.0	193	41.0000	55.0
230.0	190	41.0000	54.7
240.0	176	41.0000	53.4
250.0	182	41.0000	54.0
260.0	168	41.0000	52.6
270.0	158	41.0000	51.4
280.0	179	41.0000	53.7
290.0	173	41.0000	53.2
300.0	184	41.0000	54.2
310.0	225	41.0000	57.7
320.0	218	41.0000	57.1
330.0	197	41.0000	55.2
340.0	185	41.0000	54.2
350.0	164	41.0000	52.1

TABLE V

- 2 -

WQYX CHANNEL 230B1
25 kW @ 100 METERS HAAT
CLEARFIELD, PENNSYLVANIA

DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.9000 MHz

F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 57.0
.0	102	13.98	45.2
10.0	129	13.98	49.3
20.0	141	13.98	51.0
30.0	184	13.98	55.9
40.0	202	13.98	57.5
50.0	176	13.98	55.1
60.0	117	13.98	47.5
70.0	82	13.98	41.7
80.0	79	13.98	41.1
90.0	65	13.98	37.8
100.0	37	13.98	29.0
110.0	34	13.98	27.8
120.0	45	13.98	31.8
130.0	58	13.98	35.7
140.0	46	13.98	32.0
150.0	50	13.98	33.4
160.0	77	13.98	40.7
170.0	98	13.98	44.5
180.0	120	13.98	47.9
190.0	110	13.98	46.4
200.0	87	13.98	42.6
210.0	110	13.98	46.4
220.0	122	13.98	48.3
230.0	113	13.98	46.9
240.0	147	13.98	51.7
250.0	150	13.98	52.1
260.0	139	13.98	50.7
270.0	130	13.98	49.5
280.0	100	13.98	44.8
290.0	73	13.98	39.7
300.0	32	13.98	27.1
310.0	43	13.98	30.9
320.0	22	13.98	26.7
330.0	46	13.98	32.0
340.0	60	13.98	36.4
350.0	89	13.98	43.1

TABLE V

- 3 -

WQYX CHANNEL 230B1
25 kW @ 100 METERS HAAT
CLEARFIELD, PENNSYLVANIA

DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.9000 MHz

F(50,10) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (dBk)	CONTOUR LEVELS (dBu): 48.0
.0	102	13.98	80.5
10.0	129	13.98	85.0
20.0	141	13.98	87.0
30.0	184	13.98	92.5
40.0	202	13.98	94.9
50.0	176	13.98	91.5
60.0	117	13.98	83.0
70.0	82	13.98	76.5
80.0	79	13.98	75.9
90.0	65	13.98	72.4
100.0	37	13.98	63.0
110.0	34	13.98	61.2
120.0	45	13.98	66.5
130.0	58	13.98	70.4
140.0	46	13.98	66.6
150.0	50	13.98	68.2
160.0	77	13.98	75.4
170.0	98	13.98	79.5
180.0	120	13.98	83.4
190.0	110	13.98	81.8
200.0	87	13.98	77.3
210.0	110	13.98	81.9
220.0	122	13.98	83.8
230.0	113	13.98	82.4
240.0	147	13.98	87.8
250.0	150	13.98	88.2
260.0	139	13.98	86.6
270.0	130	13.98	85.2
280.0	100	13.98	79.9
290.0	73	13.98	74.4
300.0	32	13.98	59.8
310.0	43	13.98	65.5
320.0	22	13.98	59.1
330.0	46	13.98	66.6
340.0	60	13.98	71.0
350.0	89	13.98	77.8

ENGINEERING STATEMENT COVERING

APPLICATION FOR CONSTRUCTION PERMIT

FOR ALLEGHENY COMMUNICATIONS GROUP, INC.

CHANNEL 229B 93.7 mHz

43.5 kW MAX.(DA) @ 157.5 METERS HAAT

PITTSBURGH, PENNSYLVANIA

JUNE 1991

ENGINEERING STATEMENT COVERING
APPLICATION FOR CONSTRUCTION PERMIT
FOR ALLEGHENY COMMUNICATIONS GROUP, INC.
CHANNEL 229B 93.7 mHz
43.5 kW MAX.(DA) @ 157.5 METERS HAAT
PITTSBURGH, PENNSYLVANIA

JUNE,1991

TABLE OF CONTENTS